



Writer's direct phone  
(212) 218-5291  
Writer's e-mail  
jegan@seyfarth.com

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620 Eighth Avenue  
New York, New York 10018  
(212) 218-5500  
fax (212) 218-5526  
www.seyfarth.com

October 2, 2015

**VIA ECF**

Hon. Lorna G. Schofield  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: Civil Action No.: 1:15-cv-7151**  
***Graciela Bretschneider Doncouse v. Eddie Bauer LLC, et al.***  
**Request for Extension of Eddie Bauer's Deadline to Respond to Complaint and**  
**Continuance of Initial Pre-Trial Conference**

Dear Judge Schofield:

This firm represents Defendant Eddie Bauer LLC ("Eddie Bauer") in the above-referenced matter. We write to respectfully request an extension of time for Eddie Bauer to respond to the Complaint, as well as to reschedule the forthcoming Rule 16 initial conference and the attendant deadlines for pre-conference submissions.

By way of background, Eddie Bauer was served with the Complaint on September 28, 2015, and recently retained our firm in this matter. The present deadline for responding to the Complaint is October 19, 2015. The Court has ordered all parties to appear for an initial pretrial conference on October 27, 2015 at 10:30 a.m. (Dkt. No. 4.) The Court has also ordered the parties to file a joint pre-trial conference letter as well as a proposed case management plan by October 20, 2015. (*Id.*)

With Plaintiff's consent, we respectfully request that: (1) Eddie Bauer's deadline to respond to the Complaint be extended by 30 days, up to and including November 18, 2015; (2) the Rule 16 initial conference presently scheduled for October 27 be adjourned and re-scheduled for the week of November 30; and (3) the pre-conference submission dates be re-set accordingly. The parties are available for the conference on December 1, 2015, December 3, 2015 and December 4, 2015.

This is the first such request for an extension of these dates, and it is being made in good faith and not to cause undue delay. The reason for this request is to allow sufficient time for Eddie Bauer to investigate Plaintiff's allegations in the Complaint in advance of the deadline for a response, and also in advance of the Rule 16 conference.

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We thank the Court for its time and consideration of this request. Should the Court have any questions, please do not hesitate to contact the undersigned attorney.

Respectfully submitted,

SEYFARTH SHAW LLP

/s/ John W. Egan

John W. Egan

Attorneys for Defendant Eddie Bauer LLC

THE MARKS LAW FIRM, P.C.

/s/ Bradley G. Marks


Bradley G. Marks

Attorneys for Plaintiff Graciela Bretschneider  
Doncouse

Application GRANTED. Defendant Eddie Bauer LLC's time to respond to the Complaint is extended to November 18, 2015. The initial pretrial conference scheduled for October 27, 2015, is adjourned to December 1, 2015, at 10:40 a.m. At least one week before the conference, the parties shall file the joint status letter and proposed case management plan in accordance with the Order dated September 16, 2015.

Dated: October 2, 2015

New York, New York

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE